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BY FAX (212) 805-6326

Hon. Colleen McMahon
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Oakley et. al. v. Verizon Communications, Inc. et al.
09 Civ. 9175 (CM) (MHD)

Dear Judge McMahon:

I represent the plaintiffs in this FMLA action against Verizon Communications, Inc. Plaintiffs' reply papers on their motion for class certification are due on October 11, 2011. I write to request permission to file a reply brief in excess of the 10-page limit set forth in the court's individual rules.

Defendants' opposition papers on this motion consist of a 50-page brief, five declarations and three volumes of exhibits, extending to Exhibit JJJ. In preparing plaintiffs' reply brief, we have come to realize that we will need more than 10 pages to adequately address all of the issues raised by the defendants. Although I will make an effort to keep the number of pages to a minimum, I request permission to file a reply brief on behalf of the plaintiffs with a maximum of 25 pages.

Thank you for your consideration of this request.

OK
15 page
Colleen M. McMahon
10/13/11

Very truly yours,



Daniel E. Clifton

cc: Lorie E. Almon, Esq.
Gabrielle Semel, Esq.
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